

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE:)
)
CC HILLCREST LLC) Case No. 22-31362-SWE-11
)
)
Debtor) Chapter 11
)

HILLCREST UNION, KENNETH D. MIHM,)
RODERICK WILLIAMS, and)
ANDRE DEON MCGILVERY,)
) HEARING DATE:
Movants)
)
v.) DATE:
)
CC HILLCREST, LLC,)
)
Respondent)

DECLARATION OF TEDDI BEARD

I, Teddi Beard, do hereby declare and state as follows:

1. I reside at 2009 Hillcrest St #2037 and have lived with my daughter since February 2018.
2. I am a member of the Hillcrest Union, which has also intervened in the *City of Mesquite v. CC Hillcrest LLC, et al.* lawsuit.
3. Hillcrest Union is comprised of current and former residents of Hillcrest Apartments.
4. As part of the Union, I work with other tenants to advocate for our rights at Hillcrest Apartments. I have gathered evidence about repair problems at Hillcrest Apartments, helped people move, helped other tenants with meals, supported public appearances, and talked to reporters about what's going on at the complex.

5. Through union activities, I have spoken with and met several tenants of Hillcrest Apartments and have spoken with them about the health and safety issues that tenants are facing at Hillcrest Apartments.
6. Over the summer, Hillcrest Union and Legal Aid of NorthWest Texas surveyed 93 tenants living at Hillcrest Apartments about needed repairs.
7. Some of the common issues that tenants reported were mold infestations (particularly in air ducts), sewage leakage, no working air conditioning, vermin infestations, and plumbing problems.
8. Many tenants also have problem dealing with management to get the repairs made or get accurate information about what is happening at the property.
9. For example, in the past, I and other tenants have been denied access to the alternate accommodations at the motel, even though we were entitled to them.
10. Additionally, it is common for maintenance to say they have made repairs when they have not actually fixed the problems.
11. I joined the Hillcrest Union in March 2022. I joined out of desperation to get repairs and help my daughter.
12. In my apartment, there have been several health and safety issues in my unit that were not sufficiently or timely addressed by management.
13. Specifically, there is a significant mold infestation in the bathroom and in the air ducts. I cannot run the air conditioning due to the mold in the air ducts. When I do, my daughter gets sick.
14. Over the years, I have made several repair requests about the mold. It has not been fixed.
15. My daughter began developing all kinds of worrying symptoms after we moved in. She developed migraines, hidradenitis, asthma, depression, generalized anxiety disorder, and was diagnosed with fibromyalgia in May of 2022. That same month, she needed to stay overnight in the hospital due to an asthma attack. The doctors there told me that our living situation likely contributed to her issues.
16. In May 2022, I began staying at the Budget Inn Motel because of health and safety issues after my daughter became very sick. I stayed in the hotel for the entire summer because I was concerned for my daughter's safety, as the mold, to date, has not been completely remediated.

17. During that time, on multiple occasions, Hillcrest management would say I was not entitled to the motel room even though they had not made all of the required repairs.
18. I was only able to get back into the alternate accommodations through help from Legal Aid of NorthWest Texas and the City of Mesquite's attorneys.
19. Most recently after testifying about conditions at Hillcrest Apartments during a hearing on August 9, 2022, I was locked out of my apartment, my belongings cleared, and was accused of abandoning it.
20. I believe this was retaliation for my participation with the Hillcrest Union and my testimony.

Having reviewed this Declaration,

I declare, under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Executed on August 24, 2022

Teddi Beard

Teddi Beard

Signature Certificate

Reference number: UJDBL-TDP5L-OHOEK-X6ZG5

| Signer | Timestamp | Signature |
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